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Attorneys for Plaintiff
ORACLE AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC.,
Plaintiff,
v.
GOOGLE INC.,
Defendant.

Case No. CV 10-03561 WHA
**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF
ORACLE'S RESPONSE TO ECF NO.
1544**

Dept.: Courtroom 8, 19th Floor
Judge: Honorable William H. Alsup

1 Plaintiff Oracle America, Inc. ("Oracle") hereby moves to file portions of its Response to
 2 ECF No. 1544 and certain exhibits thereto under seal pursuant to Civil Local Rules 7-11 and 79-
 3 5.

4 The Order Approving Stipulated Protective Order Subject to Stated Conditions entered in
 5 this case, ECF No. 68, states that when material has been designated as "CONFIDENTIAL" or
 6 "HIGHLY CONFIDENTIAL – ATTORNEY'S EYES ONLY," a party may not file it in the
 7 public record, but must seek to file it under seal pursuant to Civil Local Rule 79-5. Stipulated
 8 Protective Order § 14.4, ECF No. 66.

9 Google Inc. ("Google") has designated certain materials discussed in and attached to
 10 Oracle's Response to ECF No. 1544 as "CONFIDENTIAL" and "HIGHLY CONFIDENTIAL –
 11 ATTORNEY'S EYES ONLY" pursuant to the Protective Order. Solely in order to comply with
 12 the technical requirements of the existing Protective Order, Oracle offers a redacted public
 13 version of its Response and supporting documents that comprise these Google-designated
 14 materials pursuant to the Protective Order. Oracle does not believe any portion of its brief should
 15 be sealed, and objects to its sealing and affirmatively requests that it be unsealed.

16 Oracle further requests that the Court order that no material older than two years be
 17 subject to any further request to seal, as suggested at the recent tutorial.

18 Dated: March 25, 2016

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23 By: /s/ Annette L. Hurst

25 Attorneys for Plaintiff
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